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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HAYRI OLIVAS-ARENAS, individually,
Plaintiff,

vs.

HOBBY LOBBY STORES, INC. d/b/a
HOBBY LOBBY #679 d/b/a HOBBY
LOBBY; 2199 NORTH RAINBOW
BOULEVARD HOLDINGS, LLC; DOES 1
through 100 and ROE CORPORATIONS 1
through 100, inclusive,

Defendants.

Case No.: 2:19-cv-00624-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINE
(TENTH REQUEST)**

Plaintiff HAYRI OLIVAS-ARENAS (“Plaintiff”), by and through her attorneys of record,
FARHAN R. NAQVI and PAUL G. ALBRIGHT of the law firm NAQVI INJURY LAW, and
Defendants HOBBY LOBBY STORES, INC. d/b/a HOBBY LOBBY #679 d/b/a HOBBY
LOBBY; 2199 NORTH RAINBOW BOULEVARD HOLDINGS, LLC (hereinafter collectively
referred to as “Defendants”), by and through their attorney of record, MICHAEL P. LOWRY of
the law firm WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP, submit this

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINE (TENTH REQUEST) pursuant to LR 26-4 for the Court's consideration.

I.

DISCOVERY COMPLETED TO DATE

1. A Rule 26(f) Case Conference was held and a Discovery Plan/Scheduling Order was filed.
2. Plaintiff has made initial disclosures, and supplements thereto.
3. Defendants have made initial disclosures, and supplements thereto.
4. Plaintiff has propounded a first set of requests for production to Defendant 2199 North Rainbow Boulevard Holdings, LLC, to which responses were provided.
5. Plaintiff has propounded a first set of requests for production to Defendant Hobby Lobby Stores, Inc. d/b/a Hobby Lobby #679 d/b/a Hobby Lobby, to which responses were provided.
6. Plaintiff has propounded a first set of interrogatories to Defendant Hobby Lobby Stores, Inc. d/b/a Hobby Lobby #679 d/b/a Hobby Lobby, to which responses were provided.
7. Defendant 2199 North Rainbow Boulevard Holdings, LLC has propounded a first set of interrogatories to Plaintiff, to which responses have been provided.
8. Defendant 2199 North Rainbow Boulevard Holdings, LLC has propounded a first set of requests for production to Plaintiff, to which responses have been provided.
9. Plaintiff has propounded a second set of interrogatories to Defendant Hobby Lobby Stores, Inc. d/b/a Hobby Lobby #679 d/b/a Hobby Lobby, to which responses were provided.
10. Plaintiff has propounded a third set of interrogatories to Defendant Hobby Lobby Stores, Inc. d/b/a Hobby Lobby #679 d/b/a Hobby Lobby, to which responses were provided.
11. Subpoena duces tecum have been sent to various facilities and entities requesting records.



1 12. Deposition of Hobby Lobby employee, Apolinar Lopez.

2 13. Deposition of Plaintiff.

3 14. Deposition of Hobby Lobby FRCP 30(b)(6) designee.

4 15. A site inspection has been performed.

5 16. The parties have made initial and rebuttal expert disclosures.

6 17. Plaintiff served written discovery requests seeking records pertaining to training of
7 Defendant's employees, to which responses were provided.

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9 **II.**

10 **WHY DISCOVERY CANNOT BE COMPLETED IN THE TIME PROVIDED BY THE**
11 **SCHEDULING ORDER**

12 Defendant Hobby Lobby Stores, Inc. filed a Motion for Summary Judgment on May 7,
13 2021, which this Court granted in part and denied in part following a hearing on January 11, 2022.
14 The Court granted Defendant Hobby Lobby Stores, Inc.'s Motion as it relates to Plaintiff's
15 negligent hiring and retention claims, which Plaintiff did not oppose. However, the Court denied
16 Defendant Hobby Lobby Stores, Inc.'s Motion as it relates to Plaintiff's claims for general
17 negligence, as well as negligent training and supervision. During the hearing, the Court re-opened
18 discovery until February 25, 2022 so as to allow Defendant Hobby Lobby Stores, Inc. time to
19 produce additional records pertaining to its workplace training for the two years prior to the subject
20 incident, after which Plaintiff would have the opportunity to request a continued deposition of
21 Defendant Hobby Lobby Stores, Inc.'s FRCP 30(b)(6) designee.

22 On January 13, 2022, Plaintiff served Defendant Hobby Lobby Stores, Inc. with requests
23 for production consistent with the Court's order. Defendant Hobby Lobby Stores, Inc. disclosed
24 the records on April 1, 2022. By that time, Plaintiff's counsel was preparing for a large exposure
25 products liability trial with a firm setting, and Defendant's counsel was in trial. The parties
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anticipate identifying potential trial exhibits and witnesses necessary to address issues of liability and Plaintiff's alleged damages. As such, the parties submit this Stipulation and Order seeking additional time for the filing of the Joint Pre-Trial Order.

III.

PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

DISCOVERY	Current Deadline	PROPOSED DEADLINE
Pretrial Order	June 3, 2022	June 10, 2022

The parties have entered into this Stipulation in an effort to ensure that all potential trial witnesses and documents are accurately identified in the Joint Pre-Trial Order. It is not the intent of the parties to cause undue delay. No trial date has been scheduled.

DATED this 1st of June, 2022.

NAQVI INJURY LAW

/s/ Paul G. Albright
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DATED this 1st of June, 2022.

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IT IS SO ORDERED:



UNITED STATES DISTRICT COURT JUDGE

DATED: June 2, 2022